

1 Bill Robins III, Esq. (SBN 296101)  
2 Robert T. Bryson, Esq. (SBN 156953)  
3 Rex Grady, Esq. (SBN 232236)  
4 **ROBINS CLOUD LLP**  
5 808 Wilshire Blvd., Suite 450  
6 Santa Monica, California 90401  
7 Telephone: (310) 929-4200  
8 Facsimile: (310) 566-5900

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10 Attorneys for Creditor, Gail Mitcham

11 Matthew W. Grimshaw, Esq. (SBN 210424)  
12 **GRIMSHAW LAW GROUP, P.C.**  
13 26 Executive Park, Ste. 250  
14 Irvine, California 92614  
15 Telephone: (949) 734-0187  
16 Facsimile: (208) 391-7860

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18 Counsel for Robins Cloud LLP

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21 UNITED STATES BANKRUPTCY COURT  
22  
23 NORTHERN DISTRICT OF CALIFORNIA  
24  
25 SAN FRANCISCO DIVISION

26  
27 In re ) Case No. 19-30088 (DM)  
28 PG&E CORPORATION, )  
1 ) Chapter 11  
2 and )  
3 PACIFIC GAS AND ELECTRIC ) (Lead Case–Jointly Administered)  
4 COMPANY )  
5  
6 Debtors ) **DECLARATION OF ROBERT**  
7 ) **BRYSON IN SUPPORT OF MOTION**  
8 ) **FOR ORDER AUTHORIZING**  
9 ) **WITHDRAWAL OF COUNSEL TO**  
10 ) **GAIL MITCHAM**

11 Affects:  
12 )  
13  PG&E Corporation )  
14  Pacific Gas & Electric Company )  
15  Both Debtors )

16 \* All papers shall be filed in the Lead )  
17 Case, No. 19-30088 (DM). )

## **Declaration of Robert Bryson**

I, Robert Bryson, say and declare as follows:

1. I am an individual over 18 years of age and competent to make this declaration.

2. I am an attorney with the law firm of Robins Cloud LP (the “Firm”), attorneys of record for Gail Mitcham (“Creditor”).<sup>1</sup> I am duly admitted to practice law before all courts of the State of California and before this court.

7       3. I make this declaration in support of the Firm's motion to be relieved as counsel  
8 to Creditor in the above-captioned bankruptcy case ("Motion"). The facts set forth below are true  
9 and within the scope of my personal knowledge, and if called upon to do so I could and would  
10 testify competently to these facts.

11       4. On January 29, 2019, Debtors filed voluntary petitions commencing their  
12 bankruptcy cases.

13       5. On October 16, 2019, the Firm filed Proof of Claim No. 30184 on behalf of Gail  
14 Mitcham (“Claim”), seeking damages from the North Bay Fire. Since the filing of the Claim, an  
15 irreconcilable difference has developed between Creditor and the Firm. As a result, the Firm  
16 notified Creditor that it must withdraw as counsel.

17       6. To the extent that Creditor requests that the Firm turn over any files or  
18 information that he is entitled to, the Firm will cooperate and transmit such files.

19       7. The Firm will cause the Motion to be served on all of the addresses provided to  
20 the Firm by Creditor, including the following:

2810 Porter Creek Road  
Santa Rosa, CA 95404

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 13, 2022.

  
Robert Bryson

<sup>28</sup> <sup>1</sup> The Firm retained Grimshaw Law Group, P.C. (“GLG”) to, among other things, assist it in filing this motion. GLG has no contractual or attorney/client relationship with Creditor.